

Date	Hours	Lit	Act	Line Detail
11-May	0.1	120	105	Review & Respond to Email from Beth Jones regarding Boquist and 9th Circ. Decision
11-May	0.5	120	104	Read 9th Circuit opinion - 1/2 way
20-May	0.1	120	105	Review Emails from B. Jones & Sen Boquist
20-May	1.2	120	104	Finish reading 9th Circuit Opinion
21-May	0.5	110	106	Review & Respond to Email from Boquist regarding various elements of the case
23-May	0.3	110	105	Phone Conf. with B. Jones relating to case
24-May	0.3	130	106	Review & Respond to Email from Boquist re: James Madison Center/VDD being willing to represent -
25-May	0.1	190	105	Review & Respond to Email from Beth and Boquist to set up initial meeting in Salem
26-May	0.1	120	106	Review & Respond to Email from Boquist
26-May	0.75	190	105	Conf Call with J. Gallant regarding Boquist case & potential strategy
26-May	0.1	140	106	Review & Respond to Email from Boquist
26-May	0.2	120	106	Review email from M. Abrams to Boquist and respond to Boquist
27-May	0.1	110	105	Emails to set meeting time and location in Salem
27-May	0.4	120	105	Email from B. Jones with "Boquist Memo" attached. Read Memo
27-May	0.1	130	105	Forward Memo to J. Bopp Jr.
28-May	0.1	120	105	Email to B. Jones regarding Memo and Bopp
28-May	0.1	130	105	Email from Boquist regarding sched. of Conf. on 6/8/22 with Judge McShane - Respond
28-May	0.2	130	105	Email to J. Bopp regarding case status and plan
31-May	0.2	101	104	Review emails between M. Abrams and Boquist regarding scheduling and legal issues
31-May	0.2	120	104	Review J. McShane's Sched. Order (28) and related email from B. Jones
31-May	1	110	101	Prepare for meeting with Sen. Boquist.
31-May	1.5	190	106	Meeting with Sen. Boquist & B. Jones
1-Jun	0.3	120	105	Multiple emails with Boquist regarding next steps. Review and Respond
1-Jun	0.1	120	105	Email from B. Jones regarding recrafting complaint
2-Jun	0.2	190	105	Email discussion about potential trial dates and why
3-Jun	0.1	140	106	Email from Boquist re: next steps
3-Jun	0.1	190	106	Email from Boquist goals and strategy
3-Jun	0.1	190	105	Email to B. Jones and Boquist on next steps & J. Bopp
3-Jun	0.1	190	106	Response from Boquist and reply by VDD
5-Jun	2.5	110	102	Review OLIS video of 7.8.19 Conduct Hearing - notes
6-Jun	0.1	140	105	Email from B. Jones to set up files and processes
6-Jun	0.75	140	105	Call with B. Jones - regarding court conference and filings
6-Jun	1	210	103	Draft Notice of Appearance and re-engage PACE filing system
6-Jun	0.1	120	105	Email to J. Bopp regarding case status
6-Jun	0.2	120	106	Email Boquist and discuss Rul 16 conference and plan
6-Jun	0.1	130	105	Review and Respond to J. Bopp email
6-Jun	0.4	190	105	Finalize agreement and send to B Jones for review
6-Jun	0.1	190	105	Send via email agreement
7-Jun	0.2	210	103	Review B Jones Notice of Appearance and approve/ respond to email
7-Jun	0.3	190	106	Email Boquist with documents and explanation/review client response and attached document
7-Jun	0.2	210	108	File Notice of Appearance in Pacer system & email client/B. Jones
7-Jun	0.1	120	106	Email from Boquist regarding Courtney and need to depose due to health
7-Jun	0.1	210	110	Review email response from US District Court regarding document filed (29)
7-Jun	0.1	120	105	Email from B. Jones regarding related First Amendment article and case
7-Jun	0.2	110	107	Review and Respond to M. Abrams email regarding Notice of Rep. and his contact with Sen. Boquist
7-Jun	0.1	120	106	Advise client of Notice of Appearance filed - process for case
7-Jun	0.1	210	107	Review and Respond to M. Abrams email regarding quick meeting to discuss discovery plan
7-Jun	0.1	210	110	Review email response from US District Court regarding document filed (30)
7-Jun	0.1	140	107	Email confirmation from M. Abrams regarding 3:30 pm conference call

7-Jun	0.2	140	106 Review and respond to Email from Boquist regarding discovery and Abrams - several emails
7-Jun	0.1	190	108 Review email response from US District Court regarding document filed by T. White
7-Jun	0.1	120	105 Call with B. Jones before call with M. Abrams
7-Jun	0.1	190	107 Phone Conf. with B. Jones/M. Abrams
7-Jun	0.2	190	105 Post conf. call with B. Jones regarding tasks and deadlines
7-Jun	0.3	190	106 Post conf. call with Boquist and B. Jones regarding tasks and deadlines - assigned client list of discovery tasks
7-Jun	0.1	140	105 Email from B. Jones related to Rule 26 and needed information from client
8-Jun	0.2	140	106 Long email from Boquist about discovery and documents. Review and respond
8-Jun	0.3	190	108 Rule 16 Conference with court
8-Jun	0.2	190	106 Email to Boquist with summary of Rule 16 conf.
8-Jun	0.2	210	108 Review email response from US District Court regarding document filed (31)
8-Jun	0.2	140	106 Email to Boquist with discovery tasks and update
8-Jun	0.1	140	105 Review and respond to email from B. Jones
9-Jun	0.3	140	102 Review FRCP 26 and craft discovery outline
10-Jun	0.2	140	107 Review and Response to email from M. Abrams
10-Jun	0.1	120	105 Review and respond to email from B. Jones re: Abrams email about only Speech survived, not assembly
11-Jun	0.3	140	106 document review related to email from Boquist
11-Jun	0.1	140	105 B. Jones email to Boquist with document review and response
11-Jun	0.1	140	102 Review documents attached to email - LC 8000
11-Jun	0.3	110	106 Email from Boquist related to news coverage on June 19, 2023 - review links provided
11-Jun	0.2	110	102 Review email and attachments related to conduct committee
11-Jun	0.2	120	106 Respond to email with analysis and direction
12-Jun	0.2	140	106 Email with discovery questions from client - respond
12-Jun	0.4	140	105 Review and respond to email regarding Def. request for documents + review history leading up to 6/19/19
13-Jun	0.2	140	104 Review documents attached to email - Knieling docs. Analyze and respond
13-Jun	0.1	120	104 Review B. Jones analysis of whether both speech and assembly survive based on 9th Circ. Opinion
13-Jun	0.1	120	107 Review M. Abrams response to B. Jones' analysis
13-Jun	0.2	120	104 Engage in email discussed related to Baumgart investigations and the impact
13-Jun	0.1	140	105 Email to B. Jones regarding necessity to meet in late June to go through discovery docs
13-Jun	0.2	140	105 Review email response from B. Jones and set date for trip to Salem
13-Jun	0.1	140	106 Review email from Boquist re: time to drop off documents for review
26-Jun	0.1	140	106 Email from Boquist. Review and Respond. Review attachment with narrative
27-Jun	0.2	110	102 Review video about Gelser not wanting to be on Floor during Sine Die. Respond to B. Jones
27-Jun	0.3	110	102 Review secon email with video related to walkout on 6/20/19
27-Jun	0.4	140	105 Receive and review documents sent by B. Jones - potential discovery
27-Jun	2.5	140	111 Drive to Salem from Powell Butte for review of documents
27-Jun	4	140	101 Work through documents and organize for disclosure and draft
27-Jun	2.5	140	111 Return drive to Powell Butte from Salem
28-Jun	0.3	120	105 Review disclosure prepared by B. Jones.
28-Jun	0.1	120	105 Receive and review email from B. Jones to Boquist with disclosure and plan
28-Jun	0.1	120	106 Receive and review response from Boquist and reply from B. Jones
28-Jun	0.1	110	106 Mea Culpa email from M. Abrams - he will get his disclosures to us tomorrow
28-Jun	0.1	110	106 Respond to Mea Culpa email and grant additional time. Inform on 2nd Amended Complaint timing
28-Jun	0.1	140	105 Email to B. Jones and Boquist re: Depo of Courtney dates
28-Jun	0.1	120	106 Review and respond to M. Abrams re: filing of 2nd Amend. Complaint
28-Jun	0.6	140	104 Review Plaintiff's FRCP 26 Disclosure and documents
28-Jun	0.1	190	105 Email from B. Jones re: 7/8/22 filing deadline
28-Jun	0.2	140	106 Email from Boquist regarding status of 12-hour Notice Rule. Response on status
28-Jun	0.4	190	106 Review and engage multiple emails between B. Jones and Boquist regarding LEO and 12-hour rule, etc. Respond
29-Jun	0.1	140	106 Email Boquist regarding discussion on 6/28

29-Jun	0.4	120	105 Email from B. Jones with initial draft of 2nd Amend. Complaint. Review draft and respond
29-Jun	0.2	120	106 Email from Boquist with background on Brocker
29-Jun	0.5	140	108 Receive and review Def. Rule 26 Disclosures
29-Jun	0.2	140	107 Emails to set deposition schedule to propose to M. Abrams. Review and respond
29-Jun	0.2	210	104 Review of 6/8/22 Minute Order (31) and review Motion prepared by B. Jones.
29-Jun	0.5	210	104 Receive and review drafts for 2nd Amend. Complaint and Motion.
29-Jun	0.1	210	108 Receive and respond to B. Jones re: call clerk for direction
29-Jun	0.1	210	105 Response from B. Jones - no Motion necessary. File 7/8/22
29-Jun	0.75	210	107 Receive Initial Rule 26 Disclosures from M. Abrams. Review and file
30-Jun	1.75	210	103 Review discovery. Work on 2nd Amended Complaint
30-Jun	0.2	140	105 Email to B. Jones and Boquist to set meeting to discuss discovery and deposition sched.
30-Jun	0.2	140	105 Receive and respond to various emails to set 7/5/22 conf. date for discovery needs and documents
3-Jul	0.6	210	103 Begin Draft of Second Amended Complaint
4-Jul	0.1	140	106 Email to Boquist regarding discovery and where to bring documents/review reply from B. Jones
4-Jul	0.5	210	103 Finalize draft of Second Amended Complaint - email to B. Jones and request edits
5-Jul	0.2	130	105 Send JMCFS - Jeff Gallant - email with Second Amendment Complaint for review and send video of KGW news 6.19.19
5-Jul	0.3	210	105 Receive and respond to email from B. Jones with edits to Second Amend. Complaint
5-Jul	0.4	210	105 Review additions made by B. Jones to Sec. Amend. Compl. - accept edits and reconform
5-Jul	0.2	130	105 Email to Jeff Gallant (JMCFS) regarding update Sec. Amend. Complaint. Schedule call to discuss
5-Jul	1	140	106 Meeting with Sen. Boquist & B. Jones - outline deposition list/discuss discovery plan and documents
5-Jul	0.3	140	106 Email with instruction to client re: discovery and depositions list. Supplied 7.5.22 mtg notes as attachment
6-Jul	0.3	140	106 Email from Boquist regarding documents - read through attachment sent
6-Jul	0.2	120	103 Outline of documents potentially related to defendants actions
6-Jul	0.4	140	104 Documents related to OSP - review attached contract with Legislature/scope of work - respond
6-Jul	0.5	140	106 Email from Boquist with links to Senate Rules 2019 - explanation and attachments - respond
6-Jul	0.3	130	105 Email reply from Jeff Gallant re:SAC and edits. Reviewed edits and made changes - respond
6-Jul	0.3	140	106 Email from Boquist with 2019 emails related to case. Review and File - to produce to defendants
6-Jul	0.2	210	105 Send SAC re-draft to B. Jones for review
6-Jul	0.4	130	105 Email from Rich Coleson (JMCFS) with fighting words analysis and retaliation by Def.
6-Jul	0.5	130	105 Vol 2 email with more analysis of issue from R. Coleson (JMCFS) - repond
6-Jul	0.2	130	105 Email to B. Jones regarding JMCFS analysis and evidence
6-Jul	0.1	140	106 Email from client regarding committee assignments which Courtney appointed him to since Jun 2019
7-Jul	0.3	130	105 Updated analysis from R. Coleson related to FA - speech-assembly and appears retaliation chilled both - respond
7-Jul	0.3	210	105 Email from B. Jones with final version of SAC. Review and accept edits - respond
7-Jul	0.5	140	106 Email from client with req. timeline of events for June and July 2019. Review attached timeline and respond
7-Jul	0.3	210	105 Email thread with B. Jones about filing and email to DOJ team (5 emails)
7-Jul	0.2	210	105 Review B. Jones to M. Abrams re: SAC - review M.Abrams response.
7-Jul	0.2	210	104 Review M. Abrams and T. White's objection to SAC, specifically "Freedom of Association" claim.
7-Jul	0.2	210	105 Email from B. Jones re: DOJ objection. She cites specific language that Freedom of Association was considered and should remain - respond
8-Jul	0.4	140	106 Documents received from client related to discovery. Reviewed and responded.
8-Jul	0.3	110	106 Received and reviewed updated timeline from Boquist. Review B. Jones reply
8-Jul	0.4	110	106 Long email from Boquist about timeline and documents. Review and respond
8-Jul	0.5	210	105 Call with B. Jones regarding DOJ objection to SAC. Outline response
8-Jul	0.4	210	103 Craft response to DOJ on objection to SAC. Send email.
8-Jul	0.2	210	107 Received and reviewed M. Abrams response that the SAC cannot be filed without Motion.
8-Jul	0.1	210	105 Email from B. Jones to M. Abrams stating Court Clerk says not motion necessary - McShane already ordered it
8-Jul	0.2	210	107 Email from M. Abrams conferring on Motion to Strike
8-Jul	0.1	210	110 Review email response from US District Court regarding document filed (32)
8-Jul	0.4	110	106 Email from Boquist explaining Courtney action/Committees/working together post 6.19.19 - reviewed attachments
8-Jul	0.1	210	107 Received and reviewed email from B. Jones to M. Abrams regarding discussion with court on need for motion

8-Jul	0.1	210	107 Review email from M. Abrams in response to B. Jones. Motion to Strike will be likely be filed next week
8-Jul	0.2	110	106 Email from Boquist re: prior dealings with DOJ and lack of agreement
8-Jul	0.2	110	106 Email from Boquist re: Monson case and documents/Abrams/Leg. Counsel - respond
9-Jul	0.1	110	106 Email from client re: Homeland Security Cmte - Courtney
11-Jul	0.2	140	106 Knieling email forwarded by Boquist. Related to Courtney and actions
12-Jul	0.1	210	110 Review email response from US District Court regarding document filed (33)
12-Jul	1.25	210	104 Obtain Motion to Strike, review and re-review 9th Circ. Opinion
12-Jul	0.5	210	107 Receive and review email from M. Abrams with attached Protective Order - review Order - respond
12-Jul	0.2	210	106 Email Boquist and attach Protective Order. Instruct and advise.
12-Jul	0.5	140	106 Received documents & review - email from Boquist with 3 attachments - respond
12-Jul	0.2	210	105 Email from B. Jones related to Motion to Strike
12-Jul	0.3	140	106 Email from client with suggested deposition questions - respond with instructions
12-Jul	0.2	210	106 Email from client regarding proposed Protective Order - respond
12-Jul	0.4	140	107 Draft email to M. Abrams and T. White regarding discovery and scheduling Sen. Courtney for depo & Perpetuation
13-Jul	0.2	210	107 Receive and review email from M. Abrams related to SAC. Allegations related to Sen. Manning - respond
13-Jul	0.3	140	107 Email response from M. Abrams re: Manning - respond and suggest 7.20.22 for a phone conference (5 emails)
13-Jul	0.1	140	107 Email to Boquist with information/update
13-Jul	0.1	140	106 Receive and review reply from Boquist - respond
14-Jul	0.4	140	106 Emails from client requesting an in person meeting to go over discovery and discuss Courtney depo - respond & set date for 7.19.22
14-Jul	0.5	140	107 Finish draft of email to M. Abrams & T. White re: Courtney depo & perpetuation/dates/7 categories of documents requested
14-Jul	0.2	140	107 Response from M. Abrams re: setting date for Courtney Depo/perpetuation/discovery requests - respond to questions.
14-Jul	0.3	140	106 Emails from client re: location of meeting/documents/questions. (4 emails) - respond
15-Jul	0.3	140	107 Email from M. Abrams conferring on records requests objections related to Courtney - respond (4 emails)
15-Jul	0.1	110	106 Email from Boquist related to Sec. Fagan and committee appointments - respond
17-Jul	0.4	140	106 Receive and respond to emails from Boquist re: meeting on 7.19.22 & documents to discuss (5 emails)
18-Jul	0.2	110	106 Received and reviewed updated timeline from Boquist. Respond
19-Jul	0.2	210	106 Email from client regarding proposed Protective Order and it being too restrictive.
19-Jul	4.1	140	106 In person meeting with Boquist. Review many documents and relate to time-line. Discuss Courtney depo and other depositions.
19-Jul	0.1	110	105 Email from B. Jones with link to videos related to case.
20-Jul	0.3	140	106 Email from Boquist with links to Manning and Courtney press releases - review links
20-Jul	0.5	210	104 Review Sec. Amend. Complaint in light of Manning allegations. Consider additional language
20-Jul	0.2	140	107 Pre-meeting email from M. Abrams re: logistics for 4pm meeting (7 emails between 3 people)
20-Jul	0.5	140	107 Review DOJ objections to discovery requests of Courtney. Draft alternative request & email to M. Abrams & T. White ahead of 4pm meeting
20-Jul	0.5	320	101 Pre-meeting call with B. Jones. Discuss discovery/managing allegations/depo sched.
20-Jul	0.5	320	109 Attend meeting w/ Abrams/B. Jones, Re: pending MTS, discovery, depo
20-Jul	0.3	140	107 Email from M. Abrams with 8/25/22 date for Courtney Depo/Perpetuation - respond with times and location
20-Jul	0.1	140	107 Response from M. Abrams re: depo/perpetuation schedule
20-Jul	0.2	210	105 Receive and review suggested changes to complaint from B. Jones
20-Jul	0.5	210	105 Receive from B. Jones outline for RFP/RFA/ROG - review and file
20-Jul	0.5	210	107 Draft update email to client re: mtg with M. Abrams/Protective Order/Courtney/Manning alleg/depo #
20-Jul	0.3	210	106 Email response from client with approvals and objections - respond (3 emails)
21-Jul	0.2	140	105 Review email from B. Jones to client re: 2019 Senate rules and Courtney ex officio - respond
21-Jul	0.3	110	106 Detailed email from Boquist relating to different versions of Senate rules + B. Jones reply
21-Jul	0.4	120	102 Review Senate Rules from 2/3/2020 versus earlier - 2019
21-Jul	0.75	140	104 Overview of discovery docs to be produced. Identify/organize/index.
21-Jul	0.6	110	102 Review list of indiv. Involved in 6.19.19 - 7.9.19 and research backgrounds
21-Jul	0.4	120	102 Research Rule 27 - Jan 2019 version and background
21-Jul	0.2	190	107 Logistics email from M. Abrams for Courtney depo. B. Jones response.
21-Jul	0.3	140	105 Emails with B. Jones concerning court reporter and videographer selection (4 emails)
22-Jul	0.4	120	102 Research court reporters in Salem and Eugene + videographers. Email B. Jones on same

23-Jul	0.75	210	103 Review draft Response to Mot. To Strike + email from B. Jones. Make draft suggestions.
24-Jul	0.3	210	103 Finalize draft suggestions and email B. Jones re-draft
25-Jul	0.3	210	104 Review changes to Response by B. Jones
25-Jul	0.3	140	108 Review email to court reporter by B. Jones - Send B. Jones pot. Dates for depositions in Sept and Oct.
25-Jul	0.2	210	107 Send email on Manning allegations to M. Abrams & T. White.
25-Jul	0.1	140	105 Review response from B. Jones re: depo dates in Sept & Oct.
25-Jul	0.2	140	105 Receive and review emails setting up court reporter for Courtney depo/perpetuation
26-Jul	0.3	210	104 Review final draft of PL. Resp. to Def. Mot. To Strike. Email B. Jones.
26-Jul	0.1	210	107 Email response from M. Abrams re: Manning allegations
26-Jul	0.75	210	104 Receive and review Def. FRP. From DOJ - Download and review files
26-Jul	0.1	210	110 Review email response from US District Court regarding document filed (34)
26-Jul	0.3	210	107 Email with Pl. Response attached - review and file - copy to client
26-Jul	2.3	210	103 Draft Plaintiff's First Request for Production. Email draft to B. Jones
26-Jul	0.2	140	105 Update from B. Jones on court reporter and Videographer
26-Jul	0.2	210	105 Exchange emails with B. Jones on PL. RFP re: changes
26-Jul	0.3	210	104 Review Pl. FRP for final changes - ok sending to DOJ team
26-Jul	0.1	210	107 Receive and review email to DOJ with PL. FRP.
27-Jul	0.2	140	105 Receive and review emails relating to discovery documents and Senate Journal entries
28-Jul	0.3	210	106 email to client with Def FRP. Instructions on gathering documents and organizing at B. Jones' office
28-Jul	0.2	210	106 Receive email from Boquist on documents - respond
28-Jul	0.2	190	105 Email from B. Jones about document organization/files and getting together to process RFP
28-Jul	0.3	210	106 Questions from Boquist on scope of request. Review B. Jones response. Respond
28-Jul	0.1	140	107 Email from M. Abrams re: "LB 8000"
28-Jul	0.2	140	106 Email to Boquist re: LB 8000 and discovery requests
29-Jul	0.2	140	106 Review response from Boquist.
1-Aug	0.4	110	106 Emails from client re: investigative documents - need obtain through LC process (5 email thread) - B. Jones response
1-Aug	0.2	210	107 Email from M. Abrams re: Request #7 & #8 in RFP
1-Aug	0.5	210	105 Email discussion re: Def. RFP and PL. objections. B. Jones response. Outline obj. (7 email thread)
1-Aug	0.3	210	103 Draft and send email to M. Abrams & T. White re: LC 8000 Exh 120. suggested resolution.
1-Aug	0.2	140	106 Email from client re: background to LC 8000 and Exh. 120 and why relevant
1-Aug	0.2	140	106 Email from client with prior email from B. Baumgart attached
2-Aug	0.2	140	106 Discovery email from Boquist. Respond
2-Aug	0.1	210	110 Review email response from US District Court regarding document filed (35)
2-Aug	0.2	210	106 Email to client with Def. Reply to Pl. Response to Mot. to Strike - attached
2-Aug	0.5	140	105 Engage Email thread with client and B. Jones (5 emails) re: discovery docs
3-Aug	0.4	140	105 Emails outlining additional documents. Best for client to req LC key word to search. (6 emails)
4-Aug	0.2	140	106 Email from client - pre meeting with B. Jones to go over documents. Review B. Jones response
4-Aug	0.5	140	105 Post meeting emails with client & B. Jones discussing plan to obtain more specific documents for Def. (7 emails)
5-Aug	0.5	140	104 Emails re: review of document production and search - client/B. Jones/VDD (7 email thread)
6-Aug	0.3	140	106 Email from client with LC opinions related to issue of compelling. Respond.
6-Aug	1.2	120	102 Review LC Opinions relevant to "compelling" senators to attend (arrest issue).
7-Aug	0.5	320	105 Discuss discovery search terms with B. Jones
7-Aug	0.2	120	106 Review "1-hour notice" email from client. Copy attachment
7-Aug	0.4	110	106 Receive and review documents sent by client re: 6.19.19 floor activity. Respond
8-Aug	0.3	140	105 Receive and review email by B. Jones with search terms. Client to submit.
8-Aug	0.6	140	105 Receive and review email (9) thread re: document procurement and production. Respond
8-Aug	2.5	320	111 Drive to Salem from Powell Butte for meetings & review of discovery documents
8-Aug	1	320	105 Meet w/ B. Jones in Salem Re: discovery
8-Aug	0.3	120	102 Email from B. Jones with memo attached. Respond
8-Aug	0.2	310	107 Email from M. Abrams re: objections to Pl. FRP #7 & #8

9-Aug	0.3	110	104 Read through Memo by B. Jones: True Threats/fighting words
9-Aug	0.5	120	105 Mtg with B. Jones on Memo: True Threats/fighting words
9-Aug	5.25	320	104 Review documents to produce in response to Def. RFP
9-Aug	0.5	330	101 Courtney depo prep - documents
9-Aug	0.3	320	108 Review email from D. Sanders re: terms and document search - client response
9-Aug	0.1	330	108 Receive and Review email re court reporter for 8.25.22
9-Aug	0.4	320	106 Email thread (6) re: Sarah Ryan and 2019 emails/Rule 27 docs
9-Aug	0.3	330	107 Email from M. Abrams re: Courtney's need for surgery/reschedule depo - repond
9-Aug	0.3	330	107 Emails with M. Abrams re: rescheduling Courtney depo in October 2022
10-Aug	0.2	330	106 Email to client & B. Jones re: need to resched. Courtney due to health
10-Aug	0.2	330	106 Receive and review email from Client re: Courtney
10-Aug	4.5	320	104 Work through documents and organize to produce in response to Def. RFP
10-Aug	1.75	330	101 Create list of deponents and index docs to use in depo
10-Aug	0.5	330	105 Meet with B. Jones re: Courtney depo resched & depositions. List/docs
10-Aug	0.3	140	106 Discuss with client docs and managements
10-Aug	0.4	330	107 Emails with M. Abrams re: rescheduling Courtney depo in October/Nov 2022
10-Aug	0.3	330	106 Email to client re: Travis Hampton and depo/location/docs
10-Aug	0.3	310	105 Emails from B. Jones re: FRCP 26 and scope of documents
10-Aug	0.4	310	105 Draft response to M. Abrams re: Pl #7 & #8 - send to B. Jones for review/edits
10-Aug	0.3	310	105 Rec. and Review edits by B. Jones re: email to M. Abrams
10-Aug	0.2	330	107 Email M. Abrams & T. White dates for Courtney depo/perpetuation
10-Aug	0.2	310	107 Send email to M. Abrams & T. White re: Pl #7 & #8 - send to B. Jones for review/edits
10-Aug	0.2	330	107 Rec. and review email from M. Abrams re: disc cutoff and Courtney dates
10-Aug	0.3	320	107 Email response from M. Abrams re: Pl #7 & #8
10-Aug	2.5	320	111 Drive from Salem to Powell Butte post-meeting/document prep
11-Aug	0.3	320	106 Receive and review email from client (from 8/10) re: docs & Courtney sched.
11-Aug	0.3	330	106 Rec. and Review emails from client re: depo of Travis Hampton (3) - respond
11-Aug	0.4	330	106 Update by email client on depo issues and discovery - 5 email thread
11-Aug	0.3	320	106 Rec. and review 5 emails re: documents and time-line of events - respond
11-Aug	0.1	330	107 Email from M. Abrams with updated dates for Courtney depo
11-Aug	0.2	310	105 Email from B. Jones with document dispute analysis
11-Aug	0.3	120	106 Email re: veteran status under Rule 27 amendments on 6.29.19 - respond
11-Aug	0.2	250	107 Email from M. Abrams re: Stip Prot Order status - response from B. Jones
11-Aug	0.2	120	106 Email from client regarding past emails with Courtney's office & time line - respond - sched call
11-Aug	0.1	240	107 Repond to M. Abrams for court sched. To resolve discovery dispute.
11-Aug	0.2	320	105 Rec. and review alalysis from B. Jones - discovery
11-Aug	0.2	320	105 Email with contact info and instruction to set up discovery conf with McShane
11-Aug	0.3	320	106 Email to B. Jones & V. Day from client regarding need for docs - PL RFP #7 & #8
11-Aug	0.2	330	107 Email from M. Abrams with updated dates for Courtney depo - need to extend Disc. Deadline with Court
11-Aug	0.2	250	107 Emails discussing Stip to extend discovery and filing with the court
11-Aug	0.2	120	106 Email re: HCR 11 & Rule 11 - confidentiality
11-Aug	0.1	110	106 Email to Client and B. Jones to sched. Meeting
11-Aug	0.1	210	110 Review email response from US District Court regarding document filed (36)
11-Aug	0.3	210	107 Rec. and review email from M. Abrams re: Stip. Disc. Motion - respond
12-Aug	0.1	210	107 Email response from M. Abrams
12-Aug	0.1	210	110 Review email response from US District Court regarding document filed (37)
12-Aug	0.1	210	110 Review email response from US District Court regarding document filed (36) - signed version
12-Aug	0.2	250	105 Email from B. Jones re: need to submit dispute to Court via email - respond
12-Aug	0.1	210	110 Review email response from US District Court regarding document filed (38)
15-Aug	0.1	140	106 Email from client re: scheduling mtg



15-Aug	0.3	110	106 Emails re: Courtney status. Respond.
15-Aug	0.2	330	106 Email from client with update on Baumgart docs/Rule 27
15-Aug	0.4	320	106 Email with Attachment of documents/analysis. Respond.
15-Aug	0.1	140	105 Email setting time and date for discovery mgmt meeting with client
15-Aug	0.2	250	105 Email re: discovery dispute email to go to Abrams, then the court - respond
15-Aug	0.3	110	106 List of links re: State Capitol and firearms. Reivew and respond
15-Aug	0.2	110	106 Email with attachment - FFL app & lic. Respond
15-Aug	0.2	330	101 Discussion @ carrying gun in Capitol in 2019
15-Aug	0.3	320	106 Email and attachment regarding 6.19.19 Floor speech & apology - respond
15-Aug	0.2	110	106 Email relating to supporters on 7.8.19 and OLIS docs - respond
16-Aug	0.2	330	106 Email re: 110 supporters at 7.8.19 hearing - use in depos
16-Aug	0.1	320	108 Email update from D. Sanders re: document request
16-Aug	0.2	120	106 Email analyzing 7.8.19 hearing supporters v. opposed - B. Jones response
16-Aug	0.1	210	110 Review email response from US District Court regarding document filed (39)
16-Aug	0.1	210	110 Review email response from US District Court regarding document filed (38) -revised
17-Aug	0.5	120	104 Read and analyze memo on case & elements
17-Aug	0.2	330	101 Update Deposition list & exh to be used
17-Aug	1.25	330	101 Conf call with B. Jones & Boquist re: depo list/discovery/evid/plan
17-Aug	0.5	330	105 Create Draft email to M. Abrams and T. White regarding discovery and discovery issues/objections. Send to B. Jones for additions
17-Aug	0.3	330	105 Response from B. Jones with edits and additions. Sent copy to client with req. for additions.
17-Aug	0.3	330	106 Email list response from client. Detailed Response
17-Aug	0.1	330	105 Suggestion on additional deponent. Respond
17-Aug	0.2	330	106 Client response to addl. Deponent + analysis. Respond
17-Aug	0.2	330	107 Detailed email to M. Abrams & T. White re: Deposition list and dates/disc. Email for J. McShane/Scope of representation
18-Aug	0.2	320	105 Questions about preserving evidence from Twitter
18-Aug	0.1	330	107 Email from M. Abrams that he will respond to V. Day's long email likely 8.18
18-Aug	0.2	120	105 Analysis of time to trial and various needs before - respond
18-Aug	0.2	110	106 Email relating to facts related to Defendants and critical actors
18-Aug	0.2	320	108 Detailed email from D. Sanders re: documents collected and need for USB
18-Aug	0.3	330	107 Detailed email from M. Abrams re: Deposition list and dates/disc. Email for J. McShane/Scope of representation
22-Aug	0.3	320	105 Email from B. Jones re: Pl. Response to def. RFP. Status of docs. Need to be reviewed. Respond
22-Aug	0.3	330	107 Email to M. Abrams & T. White re: Deposition list and dates/disc. Email for J. McShane/Scope of representation + timing/dates
22-Aug	0.2	320	105 Need for client to contact D. Sanders and give USB for documents. Respond
22-Aug	0.3	330	107 Detailed email from M. Abrams re: Deposition list and dates/disc. Email for J. McShane/Scope of representation/dates and times - sched. Manning depo - Respond
23-Aug	0.1	330	105 Manning depo in Eugene, 9.1.22 - logistics - respond
23-Aug	0.2	330	107 Email from M. Abrams with depo plan and 9.1.22 potential depo of Hampton - respond
23-Aug	0.1	330	107 Email from M. Abrams that Hampton is good for Bend on 9.2.22 - respond
23-Aug	0.1	330	105 Updated status on depositions and need for location in Bend 9.2.22
23-Aug	0.1	330	106 Status on Courtney
23-Aug	0.2	330	106 Updated status on depositions and location in Bend 9.2.22 - review & respond to client's questions
23-Aug	0.3	330	107 Email from T. White re: afternoon depo on 9.2.22 - respond and sug DOJ location - White agrees to inq.
24-Aug	0.5	310	105 Discussed Response to Def RFP with B. Jones
24-Aug	0.25	310	104 Review and approved Pl. Response to Def RFP
24-Aug	0.3	320	108 Rec. and Review email thread between Boquist to D. Sander re: USB drive for docs and timing
24-Aug	0.4	320	107 Transmittal of Def Response to Pl RFP - reviewed and analyzed response. Docs to follow
24-Aug	0.2	320	104 Review and research issue of objection
24-Aug	0.1	310	105 Def. response to RFP #7 & #8
24-Aug	0.2	320	107 Rec. and Review M. Abrams email @ documents not ready - maybe not until after Sep? - B. Jones responded
24-Aug	0.2	250	106 Rec and Reviewed Questions from Boquist re: Discovery dispute and McShane decision. B. Jones responded
24-Aug	0.2	330	106 Logistical questions re deposition schedule and locations - respond

24-Aug	0.2	320	107 Email from M. Abrams re: 23,500 pages of disc (Manning); @45,000 page of disc (Prozanski); and prob more for Courtney - what to do?
24-Aug	0.1	320	107 Rec and reviewed response to Abrams by B. Jones
24-Aug	0.3	320	107 Rec and reviewed detailed email from M. Abrams re: Manning discovery. Respond to B. Jones.
24-Aug	0.2	330	107 Email to T. White re: Hampton depo/logistic/and in person.
24-Aug	0.1	330	107 Response from T. White - Bend DOJ - afternoon. - Respond
24-Aug	0.2	330	106 Email from Boquist on 9.2.22 location and time. Respond
24-Aug	0.1	310	107 Rec. and Review Pl. doc file sent by M. Weeks
24-Aug	0.2	320	101 Email to B. Jones and client re: need to go through 23,000+ pages in short time/Assignments/to-do's
24-Aug	0.2	330	106 Email from Boquist with update on draft questions for Manning & Hampton - respond
25-Aug	0.2	310	106 Questions from client re: draft questions and deposition exhibits
25-Aug	0.2	320	107 B. Jones reply to M. Abrams re: Manning docs (400 ID'd + 23,000). Abrams responds
25-Aug	0.2	330	107 T. White confirms location for Hampton depo on 9.2.22. Respond with 2:30 start time
25-Aug	0.7	330	105 Draft and send Manning Depo Notice and Hampton Depo Notice to B. Jones
25-Aug	0.2	330	107 Rec and Review Notices sent by B. Jones to M. Abrams and T. White - rev. T. White's response
25-Aug	0.5	330	106 Rec. and review attached draft depo questions from client for Manning depo -respons
25-Aug	0.2	330	106 Question about Hampton Exhibits. Respond to client
26-Aug	0.2	320	105 D. Sanders USB drive being downloaded - many documents. Will take time to pdf.
26-Aug	0.2	330	108 Email by b. Jones to schedule court reporters - Manning & Hampton
26-Aug	0.1	320	107 Request for document link from M. Abrams - Marnie F. responds and resends
26-Aug	0.1	320	108 Email from Maianna Almasi re: link to Bates #00001-014084
26-Aug	0.5	320	108 DOJ doc link accessed and downloaded
26-Aug	0.2	330	108 Rec. and Review Court reporter responses for and videographer for 9.1 & 9.2.22 - response by B. Jones
26-Aug	0.75	330	106 Rec. and review attached draft depo questions from client for hampton depo -respond
26-Aug	0.2	330	105 Status update from B. Jones to client and V. Day - respond
26-Aug	0.3	330	106 Rec. and review attached draft with Additional depo questions from client for Manning depo -respons
26-Aug	0.1	320	108 Email from B. Jones to DOJ asking for Bates #'s to be updated in Def. Resp. to PL RFP
27-Aug	4.5	320	104 Review Manning document produced by DOJ. Create Exh. For depo
28-Aug	3	320	104 Review Manning document produced by DOJ. Create Exh. For depo
29-Aug	0.4	330	106 Rec. and review attached draft with Additional depo questions from client for Manning & Hampton depo -respons
29-Aug	0.2	330	105 Update on Court reporter and videographer for 9.2.22 - response
29-Aug	3.3	120	104 Review OLIS video of 7.8.19 Conduct Hearing - notes and time log for depo use
30-Aug	0.1	330	108 Conf. from Court reporter for Manning depo - response
30-Aug	0.1	330	107 Email to M. Abrams re: time Court reporter and videographer can get into DOJ conf. room
30-Aug	0.3	330	106 Email with manning doc/exh for depo - respond with instructions for exhibits
30-Aug	0.1	330	107 Response from M. Abrams - not open until 8:00am
30-Aug	0.1	330	108 Update Court reporter & videographer on logistics at DOJ in Eugene
31-Aug	2.5	140	111 Drive to Salem from Powell Butte for review of documents & prep for depositions
31-Aug	0.2	330	106 Email with Manning doc/exh for depo - respond with logistics for exhibits
31-Aug	7	330	104 Continue reviewing Def. discov. Docs & creating Exhibits for Manning & Hampton depositions (in Salem)
31-Aug	0.03	330	106 Rec & Review additional exhibits prepared and copied by Boquist
1-Sep	1	140	111 Drive to Eugene from Salem for Manning depo at DOJ offices
1-Sep	0.75	330	101 Pre-depo meeting with client
1-Sep	0.1	330	107 Email from M. Abrams re: location
1-Sep	4	330	109 Deposition of J. Manning
1-Sep	0.5	330	106 Post-Depo meeting with client
1-Sep	1	140	111 Drive from Eugene to Salem
1-Sep	1.3	330	104 Post depo mtg with B. Jones/prep for Hampton depo
1-Sep	2.5	140	111 Drive from Salem to Powell Butte
1-Sep	0.1	330	108 Rec and review court reporter confirmation for Hampton depo
1-Sep	0.3	320	105 Rec. and review docs attached from M. Fitsimmons email



1-Sep	0.3	330	106 Rec and review client depo notes - Manning
2-Sep	0.4	330	106 Emails from client with information for Hampton depo
2-Sep	0.2	320	107 Email to M. Abrams re: Document requests made during Manning depo - response from Abrams
2-Sep	0.2	330	107 Email to M. Abrams re: depo scheduling in Sept - docs - Abrams response
2-Sep	0.6	140	111 Drive from Bend to Powell Butte for Hampton depo
2-Sep	1	330	101 Make extra copies of Exhibits for Hampton depo - at Bend Fed Ex center
2-Sep	0.5	330	101 Pre-depo meeting with client and B. Jones
2-Sep	3.5	330	109 Depo of T. Hampton + post meeting with B. Jones
2-Sep	0.6	140	111 Drive from Bend to Powell Butte post depo
2-Sep	0.2	120	105 Email to B. Jones and client re: scope of representation
3-Sep	0.3	330	106 Rec and review client depo notes - Hampton
3-Sep	0.2	320	106 Rec. and review documents from client - respond
3-Sep	0.4	330	106 Additional thoughts on Hampton depo - helpful for next depositions - respond
3-Sep	0.2	330	106 Notes on future deposition subjects
5-Sep	0.1	330	106 Additional thoughts on Hampton depo - respond
6-Sep	0.2	310	105 Email discussion on supplemental request for Def.
6-Sep	0.2	140	101 Questions from client re: next depositions/discovery/court - respond
6-Sep	0.1	210	110 Review email response from US District Court regarding document filed (40) - Protect. Order signed
6-Sep	0.1	210	110 Review email response from US District Court regarding document filed (41) - Mot for Extension granted
6-Sep	0.2	210	104 Update to client on two recent orders - timeline updated by B. Jones
6-Sep	0.1	210	105 Request for B. Jones to send client a pdf of ECF No 41 - response read & reply sent
8-Sep	0.3	120	105 Email with legal analysis of subjective test or objective test. Respond
8-Sep	0.5	310	105 Rec and Review RFA doc drafted by B. Jones - respond
8-Sep	0.2	330	108 Email from DOJ staff with confirmed dates for Beyer depo (9/14) and Prozanski (9/15). Respond
8-Sep	0.2	330	105 Beth to work on Notices and secure court reporter & videographer - respond
8-Sep	0.2	330	108 Email from J. Ballard with questions about scheduling depositions (Gelser & Johnson)
9-Sep	0.2	330	108 Updated depo schedule from J. Ballard. Reply by J. Ritchie with Beyer and Prozanski Notices
10-Sep	0.2	330	106 Email to client updating status.
12-Sep	0.2	330	105 email from B. Jones with videographer confirmation for 9/15 + confirmed Court reporters for 9/14 & 15
12-Sep	0.3	330	108 Rec and review email from Videographer - link to Hampton video - downloaded
13-Sep	0.2	330	106 Email thread (6) re: Betsy Johnson calling client and saying Abrams/DOJ does not represent her - gave # for V. Day to call - respond
13-Sep	0.3	330	106 Logistics update to client on depositions for 9/14 & 15 - reply from client
13-Sep	0.3	320	105 Rec and review email and attachment from B. Jones - respond
13-Sep	0.5	410	105 Draft email to M. Abrams and T. White regarding B. Johnson. Send draft to B. Jones. Review edits from B. Jones
14-Sep	2.75	330	109 Drive to Eugene from Powell Butte for depo of L. Beyer
14-Sep	1	330	101 Pre-depo meeting with client to finalize depo plan for Beyer and Prozanski
14-Sep	1	330	109 Deposition of L. Beyer
14-Sep	0.3	330	106 Post depo meeting with client
14-Sep	1	330	111 Drive from Eugene to Salem
14-Sep	0.2	330	107 Email from M. Abrams in response to thread on scheduling Oct. depositions - via J. Ballard - respond with dates for Nov.
14-Sep	2.5	330	101 Prepare Exhibits for Prozanski depo/copy/organize
14-Sep	1.75	330	101 Review OLIS video of 7.8.19 Conduct Hearing - notes and time log for depo use
14-Sep	0.4	330	102 Email from B. Jones with 9th Circuit notes and suggestions for Prozanski depo
15-Sep	1	330	111 Drive to Eugene from Salem for Prozanski depo at DOJ offices
15-Sep	0.5	330	101 pre-mtg with client
15-Sep	5	330	109 Deposition of F. Prozanski #1 at DOJ offices
15-Sep	0.1	320	107 Rec and Review email from B. Jones to T. White re: produce hand written notes from 2019
15-Sep	0.2	320	107 Rec and review response from T. White to B. Jones re: document production. Respond to T. White
15-Sep	0.2	140	105 Email from B. Jones re: 2019 Brocker email to Boquist
15-Sep	0.1	330	107 Email from T. White about B. Johnson depo - respond

15-Sep	2.5	140	111 Drive from Salem to Powell Butte after working at Beth's office
16-Sep	0.1	330	108 Email to J. Ballard with additional Nov dates for depositions
16-Sep	0.2	330	108 Email to J. Ballard and T. White/Abrams with additional information re: depo list and dates
16-Sep	0.1	330	108 Email from J. Ballard requesting Dec dates for depositions - respond
16-Sep	0.3	320	106 Email thread (5) with client re: Baumgart/Knieling/Rule 27/Stole-Reeves contract
19-Sep	0.2	250	105 Email re: Declaration for SMJ - 9th Circuit recipe - respond
20-Sep	0.2	330	108 Email from J. Ballard re: F. Prozanski depo #2 set for 11/18/22. Send on to B. Jones and client
23-Sep	0.2	330	107 Email from M. Abrams re: dates for Boquist depo. Send email on to client and inquiry if those work. Reply to Abrams
26-Sep	0.3	330	106 Response from client and from B. Jones re: dates for depo
27-Sep	0.2	330	108 Email with link from Court reporter - Manning transcripts. Download
27-Sep	0.2	330	107 Email from M. Abrams re: Nov Depo date for boquist & discovery.
27-Sep	0.2	330	107 Reply to M. Abrams - Nov 9 works for Boquist depo - discovery reminder
27-Sep	0.3	330	107 Emails relating to rescheduling Courtney for depo/perpetuation (4 emails) - respond
27-Sep	1.75	140	104 Review and organize exh. and documents into more specific files
28-Sep	0.2	330	108 Email from J. Ballard re: F. Prozanski depo #2 re-set set for 11/14/22. Respond
29-Sep	0.3	330	105 Email status update to B. Jones and client. Review B. Jones response & Boquist's
30-Sep	0.3	330	105 Email thread (4) with B. Jones and client. Expected court sched and SMJ planning
30-Sep	0.4	110	104 Email thread on arrest/Sgt. Of Arms/status of law. B Jones responses/Client input
30-Sep	0.6	330	106 Rec and reviewed large attachment with prop exh. For Brocker depo. Download and review.
1-Oct	0.2	320	105 Email from B. Jones re: HCR 20/LEO
2-Oct	0.3	120	102 Documents related to Rule 27 and when HCR 20 became effective. Email from B. Jones
4-Oct	0.2	210	105 Email from B. Jones re: status on RFA & Rgs. Respond
5-Oct	0.3	320	107 Email to M. Abrams & T. White re: documents requested/status. Reviewed responses by Abrams
5-Oct	0.75	120	102 Re-read 9th Circ. Opinion in Boquist case
5-Oct	0.2	320	108 Email from M. Almasi re: link to DOJ discovery
6-Oct	1.5	320	104 Download and review docs. Email client and B. Jones
6-Oct	0.3	330	105 Email thread with B. Jones re: depo sched/RFA/ROGs/
6-Oct	0.2	330	106 Rec and Reviewed email from B. Jones to client with October depo sched.
7-Oct	0.3	330	107 Email thread re: setting depositions in Nov/Fagan/Boquist
7-Oct	0.4	210	104 Rec and review re-draft of RFA from B. Jones
9-Oct	0.3	330	106 Email from client re: when is Courtney depo scheduled. Respond
9-Oct	0.2	330	106 Email with facts outlined re: Prozanski/Senate Rules. Respond
10-Oct	0.3	330	108 Emails from Court report re: transcript of Hampton depo/link/download
10-Oct	0.3	330	106 Email thread re: setting deposition for Courtney - 11/4
11-Oct	0.2	330	107 Email thread re: setting depositions in Nov/Fagan/lunch break
11-Oct	0.5	120	101 Call with B. Jones re: Lit plan and next steps
11-Oct	0.5	210	103 Start re-draft of RFA - separate for each Def.
11-Oct	0.1	210	103 Review draft of Interog.
11-Oct	0.3	210	103 Re-draft Sub Duces Tecum for KGW
11-Oct	1	320	104 Read through Depo docs related to Boquist
11-Oct	0.3	120	102 Review Conduct Hearing video clips
12-Oct	0.2	330	107 Email to M. Abrams & T. White re: 11/9/22 good for Courtney depo. Review Abrams response
12-Oct	0.3	330	105 Rec and review 5 Notice of Depositions sent to M. Abrams, etc.. Email to client.
12-Oct	0.3	320	107 Email thread about Sup Duces Tecum to KGW. M. Abrams confirms no objection. Response. Email client copies
12-Oct	0.1	320	108 Email from M. Almasi re: link to DOJ discovery
13-Oct	0.4	120	102 Email from B. Jones with extensive research on the history of Rule 27. Respond
17-Oct	0.1	320	108 Email from M. Almasi re: link to DOJ discovery
18-Oct	0.1	210	110 Review email response from US District Court regarding document filed (42) - Mot to Strike Denied
18-Oct	0.2	330	108 Email from Court reporter with attached Errata sheet - Hampton
18-Oct	0.4	210	105 Email thread (11) with B. Jones/client/V. Day re: Motion to Strike. Moving forward with Amendments

18-Oct	0.2	330	108 Rec and reviewed email from J. Ballard with Boquist Not. Of Depo. B. Jones provided to client
19-Oct	0.3	320	105 Email thread (5) with B. Jones/client re: upcoming deposition/Boquist depo/sched conf. call
19-Oct	0.2	320	106 Email from client re: OSP threat assessments? Documents/discovery. Respond
19-Oct	0.3	320	105 Email thread (6) re: Investigator standards under Rule 27/Baumgart/Discovery Subp.
19-Oct	0.2	330	106 Email from client re Depositions. B. Jones reply. V. Day respond
20-Oct	0.3	110	105 Email discussion on Declarations - Knopp, etc.
20-Oct	0.2	330	106 Email re status of request for DOJ to produce Baumgart. Draft Depo Subp.
20-Oct	0.3	330	107 rec and review email thread (6) re: Notice of Depo for S. Fagan/ corrections/sent out
22-Oct	0.2	210	105 Rec and Review early draft of SMJ outline. Respond
22-Oct	0.3	210	105 Rec and review draft by B. Jones for Third Amended Complaint. Respond with edits
24-Oct	1.5	190	106 Conf. call with B. Jones and client. Long discussion on strategy for next 2 months/pleadings/document review
24-Oct	0.6	320	105 Email thread (11) with B. Jones/client/V. Day re: Rule 27 complaints/number/who?/status/Kotek
25-Oct	1	120	105 Call with J. Jones re: Baumgart docs/depo/MSJ plan
25-Oct	0.2	330	104 Rec and review final version of Courtney Depo Notice (sent to DOJ on 24-Oct)
25-Oct	3.5	330	101 Review discovery/select exh./Print and organize at Fed Ex
25-Oct	2.75	140	111 Drive to Fairview for depositions on 10/26
25-Oct	1.5	120	104 Read docs and create questions
25-Oct	0.2	330	106 Rec. and review depo questions from client re: Knieling
26-Oct	0.3	140	101 Print last Exh at Fed Ex in PDX
26-Oct	0.5	330	109 Drive from Fairview to DOJ office in PDX/Park
26-Oct	1	330	109 Deposition of L. Brocker (#1) Need to schedule #2 segment due to mis-communication
26-Oct	1.5	330	106 Lunch Meeting with client re: discuss Burdick depo and exh/plan
26-Oct	1.75	330	109 Deposition of Ginny Burdick
26-Oct	1.5	120	106 Post-Depo meeting with client
26-Oct	0.5	140	111 Drive from DOJ PDX to Fairview
27-Oct	1.5	140	111 Drive to B. Jones offices - Fairview to Salem
27-Oct	1	190	105 Meeting with B. Jones re: current status/TAC/depositions/documents
27-Oct	0.5	210	103 Review and revise Third Amend Complaint/email to B. Jones
27-Oct	0.5	330	104 Review and advise Legal Asst on Depo Notices- form and logistics
27-Oct	0.3	110	102 Email thread (6) re: Gelser Blouin Employee case/docs/Rule 27
27-Oct	0.2	330	108 Email to and from Court reporter ordering Burdick transcript
27-Oct	6	320	104 Review/organize/file/create Exh. Out of Production #3 and #4 from DOJ
28-Oct	2.6	330	109 Deposition of Sec. S. Fagan
28-Oct	0.5	190	106 Meeting with client between depositions - review exh/questions
28-Oct	3.2	330	109 Deposition of J. Knieling
28-Oct	0.5	190	105 Post depo meeting with B. Jones
28-Oct	2.5	140	111 Drive from Salem to Powell Butte
28-Oct	0.3	320	103 Email thread (5) re: Baumgart Subp/costs/form/final
29-Oct	0.2	320	102 Email from B. Jones re: Monson litigation - Sec Amend Complaint/LEO
29-Oct	0.3	320	102 Email from client re: S. Gelser Blouin docs/questions/Monson
30-Oct	2.4	330	101 Review Gelser related docs/videos/craft questions/create Exh.
31-Oct	2.5	140	111 Drive from Powell Butte to Salem for depo
31-Oct	0.3	320	104 View Gelser video sent by B. Jones
31-Oct	3.5	330	109 Deposition of Sara Gelser Blouin
31-Oct	2.5	140	111 Drive from Salem to Powell Butte after depo
31-Oct	0.1	210	108 Review email response from US District Court regarding document filed (43) - Third Amend Complaint filed
31-Oct	0.1	210	108 Review email response from US District Court regarding document filed (44) - Answer to Third Amended Complaint
31-Oct	0.2	210	107 Rec and review emails from M. Abrams and B. Jones re: Third Amend Complaint
31-Oct	0.1	210	105 Email to B. Jones re: Def Answer
31-Oct	0.5	320	106 Emails relating to OSP documents/Hampton/2019 emails/facts

1-Nov	2.4	110	104 Review, index, and capture quotes from participants/def for upcoming depositions and MSJ.
1-Nov	0.2	210	104 Rec and Review TAC & Def Answer mark up by B. Jones & sent to client. Respond
2-Nov	0.3	320	106 Email from client with documents for use in depositions. Review attachments & respond
2-Nov	0.3	410	108 Phone conf. with Sen. Knopp. Discuss his memory about facts. Discuss OLIS video. Asked to consider Decl.
2-Nov	0.4	410	108 Phone conf. with former Sen. Olsen. Discuss his recollections. Discuss OLIS video. Asked to consider Decl.
2-Nov	0.2	110	106 Email update to client and plan for SMJ
2-Nov	0.5	210	105 Discussed Def. Answer are focused on "individual" capacity - probably should amend to address. Email thread (4) with B. Jones
2-Nov	0.2	330	107 Rec and review email to M. Abrams & T. White re: Amended Notice of Dep. For F. Prozanski. Download & file
2-Nov	0.6	110	102 Research and locate Protest video - Sen R. Monroe's home. Download & file for depositions
2-Nov	0.2	330	106 Emails to client re: exhibits for Courtney & Monnes-Anderson depositions
2-Nov	6	330	101 Prepare for Sen. Courtney's depo & perpetuation
3-Nov	0.1	210	108 Review email response from US District Court regarding document filed (45) - Fourth Amend Complaint filed
3-Nov	2.5	330	111 Drive from Powell Butte to Salem for depo on 11/4
3-Nov	1.2	330	101 Watch OLIS for Senate Floor 6.19.19/take quotes/time index
3-Nov	2.75	330	101 Craft Depo script. Create Exhibits/label.
3-Nov	1.5	410	101 Outline perpetuation - craft questions - finalize Exhibits
3-Nov	0.75	330	101 Review Dick Hughes interview video - B. Boquist 6.19.19
3-Nov	0.75	330	106 Meeting with client - pre-depo prep.
3-Nov	0.1	210	108 Review email response from US District Court regarding document filed (46) - Answer to Fourth Amend Complaint
3-Nov	0.1	210	108 Email to Court regarding 4th Amend Complaint
4-Nov	0.1	210	106 B. Jones email to Boquist with update
4-Nov	3.75	330	109 Deposition of Peter Courtney
4-Nov	1	330	106 Meeting with client re: final prep for perpetuation of Courtney
4-Nov	1.8	410	109 Perpetuate Trial Testimony of P. Courtney
4-Nov	1.2	120	105 Meeting with B. Jones - use of depo & perpetuation for SMJ
4-Nov	2.5	330	111 Drive from Salem to Powell Butte
5-Nov	0.3	410	106 Courtney depo/perpetuation notes from Boquist/supporting evidence for SMJ
5-Nov	0.1	330	105 Email from B. Jones re Baumgart Subpoena
5-Nov	0.3	110	106 document review related to Conduct Cmte members and history. Background for trial
6-Nov	0.3	330	108 Email thread with Marla Sharp re: need for numerous video clips used in Courtney depo/perpet. Find and send videos
7-Nov	1.2	140	104 Review case materials - what else needed? Outline remaining evidence/re-organize docs
8-Nov	0.1	330	106 confirm boquist pre-depo meeting with client and B. Jones
8-Nov	0.2	120	106 Email from client re: Public records release by Gov contained AG's emails reg arrest - no atty-cl priv
8-Nov	0.2	330	106 Critical OSP email to be used in Baumgart depo - sent by client
8-Nov	2	330	104 Review documents and emails in preparation for Boquist depo
9-Nov	2.5	330	109 Drive from Powell Butte to Salem for Depo
9-Nov	0.75	330	101 Meeting with client and B. Jones before depo.
9-Nov	3	330	109 Deposition of B. Boquist
9-Nov	1	120	106 Depo break meeting with client/B. Jones
9-Nov	3	330	109 Deposition of B. Boquist - second half
9-Nov	0.5	120	106 Post depo mtg with client and B. Jones
9-Nov	0.1	330	101 Email from M. Abrams re: Baumgart non-availability
10-Dec	0.1	330	101 Email response to M. Abrams and T. White re: scheduling Baumgart
10-Nov	2.5	330	111 Drive from Salem to Powell Butte
10-Nov	0.1	140	105 Email to request copy of B. Jones depo notes from Prozanski #1. Obtained
10-Nov	0.3	330	101 Rec/review/respond to email thread (8) with court rpt/videographer/b.Jones re: upcoming depositions/time/logistics
10-Nov	0.2	330	101 Obtain link from Discovery Media Productions for downloading depo videos
10-Nov	0.2	120	106 Email discussion on "Interim Safety Measures/HCR 20/lack of authority to implement on 7/8/19
10-Nov	0.1	330	106 Post-depo disc. Regarding certain questions asked in client's depo
11-Nov	0.2	120	106 Additional email discussion on "Interim Safety Measures/HCR 20/lack of authority to implement on 7/8/19

11-Nov	0.3	330	101 Rec/review/respond to email thread (11) with client/B. Jones re: upcoming depos/time/logistics
11-Nov	0.2	210	105 Emails with B. Jones re: Declarations form/timing
11-Nov	0.4	330	108 Email from Car Court reporting re: link to S. Fagan & J. Knieling depositions. Download and review/file
12-Nov	0.5	330	106 Email from client with 4 attachments for Prozanski and Bocker depositions. Download and review
13-Nov	2.6	330	109 Drive from Powell Butte to Eugene
14-Nov	0.8	330	103 Pre-depo meeting with client - final prep
14-Nov	0.1	330	101 Email to B. Jones re: dates to reschedule B. Baumgart.
14-Nov	0.3	330	109 Email from T. White to advise of arrival (last email of a thread of 14)
14-Nov	3.8	330	109 Deposition of F. Prozanski #2 at DOJ Eugene offices
14-Nov	1	330	111 Drive from Eugene to Salem
14-Nov	1.1	330	101 Prepare for Monnes-Anderson depo/Exh. Review/label
14-Nov	1.5	330	101 Prepare for Bocker depo/Exh. Review/label
14-Nov	0.3	210	105 Mtg with B. Jones on RFA
14-Nov	0.5	210	103 Finalize RFA to J. Manning
14-Nov	0.5	210	103 Finalize RFA to F. Prozanski
14-Nov	0.5	210	103 Finalize RFA to P. Courtney
14-Nov	1	330	111 Drive to Fairview for depositions on 11/15 in Gresham
14-Nov	0.1	330	101 Email to client on location to meet for Monnes-Anderson depo in Gresham
15-Nov	0.5	330	103 Pre-depo mtg with client - final prep
15-Nov	1.1	330	109 Deposition of L. Monnes Anderson - Gresham
15-Nov	0.25	330	104 Call with B. Jones/mtg with client post depo
15-Nov	1	330	109 Drive to Salem from Gresham
15-Nov	1.5	210	103 Finalize 1st set of Interrogatories & email drafts to B. Jones
15-Nov	0.4	320	103 Create list of 4 discovery issues and send email to M. Abrams
15-Nov	2.6	330	109 Deposition of L. Bocker #2 - Salem DOJ offices
15-Nov	0.2	320	107 Rec and review response from M. Abrams re: discovery issues (4)
15-Nov	0.75	240	105 Meeting re: SMJ plan and remaining depositions/declarations
15-Nov	2.5	330	111 Drive from Salem to Powell Butte
15-Nov	0.4	320	107 Rec & review email thread (6) regarding email from M. Abrams about client email sent b-4 we rep. client
16-Nov	0.1	330	104 Email from client with observations and notes on Bocker #2 depo - attachment reviewed & downloaded
16-Nov	0.2	330	104 Email from client with observations and notes on Monnes-Anderson depo - Attachment reviewed/downloaded
16-Nov	0.25	330	105 Meeting with client & B. Jones to sched. Final 2 depositions
16-Nov	0.9	410	104 Review Prozanski #1 depo/depo notes/Rule 27 versions
16-Nov	1.6	210	103 Craft Second set of Interrogatories to Prozanski -finalize
16-Nov	0.25	410	108 Call with fact witness
16-Nov	0.3	140	106 Call with client re: documents/copies
16-Nov	0.2	330	106 Email re: Senate Sec determination re: power of comte chair
16-Nov	0.4	140	106 Email with attachment - "HCR 20 effective Nov 25, 2019" doc/download/review
16-Nov	0.3	210	107 Rec. and review email to M. Abrams & T. White re: 3 sep. sets of Interrogatories/download/file
16-Nov	0.2	330	101 Rec/review/respond to M. Abrams in email thread (9) - setting depo date for B. Baumgart
16-Nov	0.2	330	111 Email from Videographer with link for 11/14/22 Prozanski depo/download/file
17-Nov	0.1	110	108 Subscribe to Oregon State Legislature
17-Nov	0.1	110	107 Email from M. Abrams re: recent OR Sup. Ct. filing/with attachments - B. Jones responded
17-Nov	0.2	330	101 Email to M. Abrams & T. White with Notice of Depo for T. Kotek + Subpoena
18-Nov	0.2	330	107 Email from M. Abrams confirming 11/29 depo - respond
18-Nov	0.3	320	107 Emails from M. Abrams Re: Bocker emails/review attachments
20-Nov	0.35	210	101 Call with J. Gallant (JMCFS) re: pot assistance w/ MSJ
20-Nov	0.5	120	106 Call with client re: issues at SMJ. Upcoming Baumgart depo
20-Nov	0.5	210	105 Call with J. Gallant (JMCFS) re: MSJ - vol cessation/mootness
20-Nov	0.35	240	105 Call with B. Jones re: 4pm mtg/discovery issue/11/28 conduct mtg

21-Nov	0.1	110	101 Notice of conduc cmte meeting 11/28/22 - schedule
21-Nov	0.2	320	107 Email response re "capitol building" question/Brockner disc. - Oy vey response
21-Nov	0.4	310	107 Email from M. Almasi re: attached Privilege Log - download/file/review
21-Dec	0.3	330	108 Email from Court reporter with attachment: Monnes-Anderson depo trans/download/review/file
22-Nov	0.2	101	106 Emails discussion re: conduct cmte meeting on 11/28
22-Nov	1	190	105 Conf call with client & B. Jones - issues on SMJ/depo plan/evid.
23-Nov	0.75	110	105 Call with B. Jones - auth of cmte/add claim/cmte on Monday
23-Nov	0.3	110	106 Emails from client re: conduc cmte agenda/discovery
28-Nov	0.5	110	104 Attend on-line conduct committee hearing to rescind sanction
28-Nov	0.3	110	106 Emails with client re: conduct cmte meeting today
28-Nov	0.5	330	107 Email thread (150 from M. Abrams canceling Kotek dpo due to flight issues/gave alternative dates - respond - Rescheduled
30-Nov	0.2	330	101 Emails from client regarding depositions - sick, may not make it
30-Nov	3	330	109 Drive from Powell Butte to Portland for Depo
30-Nov	2.1	330	109 Deposition of Brenda Baumgart #1 - Portland
30-Nov	0.5	330	111 Drive to Fairview from Portland - post depo
30-Nov	0.2	330	106 Call with Boquist with overview of B. Baumgart depo
1-Dec	2.6	330	111 Drive from Fairview to Powell Butte
2-Dec	0.3	330	108 Email and link to recent Prozanski transcript/Download/file
2-Dec	0.3	330	104 Call with B. Jones re: documents/Subpoena to B. Baumgart
3-Dec	0.2	330	105 Email thread about Depo transcripts - several needed - respond- B. Jones reply
5-Dec	0.5	330	104 Email thread (10) re: ordering P. Courtney's depo & perpet. Transcripts/6 attachments/download/file/review/email to B. Jones
5-Dec	0.2	330	107 Email to M. Abrams & T. White with Notice of Depo for T. Kotek - resched
5-Dec	0.6	190	105 Call with B. Jones re: Depo transcripts/dclaration status/Baumgart Subpoena/Interog
5-Dec	0.2	330	105 Upload and email B. Jones the depo transcript of Monnes-Anderson
6-Dec	0.3	320	107 Email thread (4) with M. Abrams re: remaing discovery issues
6-Dec	0.2	440	107 Email commitment from M. Abrams not to call any person from "whited out list." - Respond
6-Dec	0.5	160	106 Discussion with client re: terms of settlement & authority to offer
6-Dec	0.2	210	107 Email Third set of Interrogatories - attached - M. Abrams response
6-Dec	0.3	330	108 Email from Court reporter with link to S. Galser Blouin depo/Download/review/file
8-Dec	3.3	330	109 Drive from Powell Butte to downtown PDX - DOJ offices
8-Dec	3	330	109 Deposition of T. Kotek - Portland DOJ
8-Dec	1	160	107 Settlement discussion with M. Abrams - in person/post depo
8-Dec	3.3	330	111 Drive from DOJ PDX to Powell Butte
9-Dec	0.5	120	104 Read H. Myers AG Opinion (#8265)- Ore Constit. IV, Sec 9
9-Dec	0.3	320	104 Review all emails related to discovery - ID what is missing
9-Dec	0.2	320	106 Call with Client re; discovery
9-Dec	0.3	410	103 Work on Declarations list for SMJ
9-Dec	0.1	240	105 Email from B. Jones re: Hernandez case and SMJ - does not apply
9-Dec	1.5	410	103 Draft Declaration for Fact witness previously interviewed
9-Dec	0.3	320	105 Call with B. Jones re: discovery issues and MSJ elements
12-Dec	1.6	310	105 Draft email to Judge McShane with Discovery issues outlines - email draft to B. Jones to review.
12-Dec	0.3	160	106 Email thread (9) re: settlement proposal
12-Dec	0.3	160	107 Email response from M. Abrams re: settlement terms
12-Dec	0.2	160	107 Response to M. Abrams with settlment proposal attached/Notice of email to McShane
13-Dec	0.1	310	105 Rec and review the email (final version) sent to Judge McShane re: discovery issues & deadlines
13-Dec	0.2	310	107 Private Email in response to PI esq. letter to Judge McShane
13-Dec	0.2	320	107 Rec and review email to M. Abrams & T. White re: Subpoena Decus Tecum to Baumgart
13-Dec	0.1	310	107 Email from M. Abrams re: Baumgart suboena
13-Dec	0.3	330	108 Email from Court reporter with L. Beyers depo transcript attached - downloaded/reviewed/filed
13-Dec	0.2	160	107 Email from M. Abrams re: PI settlement proposal is a non-starter



13-Dec	0.1	160	106 Email update to client re: settlement proposal
13-Dec	0.3	310	107 Rec and review email from M. Abrams to Judge McShane re: discovery issues brought up by Plaintiff
14-Dec	0.1	160	106 Email response from client re: Abrams response to settlement proposal - respond
14-Dec	0.3	310	107 Email from B. Jones with edits to reply to Abrams response to Judge McShane
14-Dec	0.3	310	108 Send email to Judge McShane - in reply to 12/13 email by M. Abrams w/ 5 attachments
15-Dec	0.1	310	107 Email from M. Abrams re: email to court
15-Dec	0.1	310	105 Email from B. Jones responding to M. Abrams
15-Dec	0.1	310	107 Email from M. Abrams that pl esq. need to apologize
15-Dec	0.1	310	105 Email from B. Jones to M. Abrams re: only 15 rogs in first set - not 22
15-Dec	0.4	310	107 Rec and review email thread re: Interrog #'s & M. Abrams' concerns
15-Dec	0.2	310	105 Call with B. Jones. Abrams and the weird set we did not send
15-Dec	0.4	320	108 Email from J. Ballard RE: 7 sets of responses to RFA/Rogs - Download/review/file
19-Dec	0.2	320	108 Email from J. Ballard RE: responses to Proz 3rd set of Rogs - Download/review/file
19-Dec	0.2	330	108 Email thread with court reporter and OLIS video - Brenda Baumgart transcript
20-Dec	0.3	330	108 Email from Court reporter with link to B. Baumgart #1 depo/Download/review/file
20-Dec	0.3	320	108 Email from M. Almasi with document link - Boquist 5 - download/review/file
20-Dec	0.2	310	107 Email to M. Abrams and T. White re: Status on outstanding discovery requests
20-Dec	0.2	310	107 Response email from M. Abrams re: discovery and priv. log - response
21-Dec	0.8	320	104 Review recent docs provided in disc. 20 out of the 120
21-Dec	0.3	310	105 Call w/ Beth re: Email to McShane and discovery outstanding
21-Dec	1.2	310	103 Draft email to Judge McShane with Discovery issues - review prior emails
21-Dec	0.3	320	104 Download documents and Baumgart depo
21-Dec	0.3	310	103 Re-draft and send reply to Abrams email to Judge McShane
21-Dec	0.2	310	107 Email from M. Abrams that discovery issues have all been addressed and Baumgart Subpoena is invalid - respond - Abrams replies
21-Dec	0.3	310	108 Final email to Judge McShane in response to most recent M. Abrams email
22-Dec	0.1	160	107 Email from M. Abrams re: satisfied LR7-1?
28-Dec	2.3	120	104 Read Baumgart deposition transcript for MSI/pot. Second depo
29-Dec	0.2	250	105 Email to B. Jones and client re: Order from Judge McShane - discovery extended for 45 days
30-Dec	0.1	230	108 Review email response from US District Court regarding document filed (48) - Scheduling Order
2-Jan	0.2	330	108 Email from Court reporter with T. Kotek depo attached/Download/review/file
5-Jan	0.3	320	107 Email discussion with M. Abrams re: Subp Duces Tecum to Stoel Rives
6-Jan	0.1	440	107 Email from M. Abrams re: potential trial dates
9-Jan	0.2	440	107 Detailed email from M. Abrams suggesting certain weeks in 2023 as trial dates
10-Jan	0.2	320	105 Emails w/ B. Jones discussion on Subpoena under FRCP - plan
10-Jan	0.1	440	107 Respond to detailed email from Abrams - ask for depo dates from Baumgart & Prozanski
10-Jan	0.2	330	101 Emails with M. Abrams re: Prozanski in person or by video/Baumgart procedure - respond
11-Jan	0.2	320	105 Emails discussion on Subpoena under FRCP - plan
12-Jan	0.3	320	105 Emails discussion on Subpoena under FRCP - B. Jones execute on plan
13-Jan	0.2	230	107 Email exchange re: Boquist Status Report for court
13-Jan	0.1	230	108 Review email response from US District Court regarding document filed (49) - Joint Status report
13-Jan	0.2	320	107 Email to K. O'Connor and M. Abrams re: Subpoena Duces Tecum for Baumgart records
20-Jan	0.2	330	107 Notice of Deposition to M. Abrams & T. White re: Prozanski 1/27/23 video depo
20-Jan	0.2	320	107 Emails with K. O'Connor re: Subp Duces Tecum and Baumgart depo
20-Jan	0.3	320	107 Email from M. Almasi with document link - Boquist 6 - download/review/file
21-Jan	2	320	104 Read through and review discovery docs produced on 1/20/23
21-Jan	0.2	320	105 Call w/ B. Jones re: recent documents
22-Jan	0.3	330	106 Email thread (10) with client re: 1/27/23 video depo logistics and substance
23-Jan	0.3	330	107 Email thread (6) re: Subp Duces Tecum and Baumgart depo
23-Jan	0.1	320	107 Call with M. Abrams re: Baumgart docs - tried to get K. O'Connor on the phone.
23-Jan	0.1	320	107 Call with M. Abrams re: Baumgart depo/docs

23-Jan	0.2	320	107 Email from M. Almasi with document link - Boquist Supplemental - download/review/file
23-Jan	0.2	320	106 Email thread (6) with client re: supplemental documents produced
23-Jan	0.3	240	105 Email thread (9) re: Conduct Cmte Notice document sans names
24-Jan	0.3	310	108 Draft Subpoena for Baumgart
24-Jan	0.2	330	108 Emails with K. O'Connor and M. Abrams re: depo date and documents
25-Jan	0.3	310	108 Finalize Baumgart Subpoena and send to B. Jones/Marnie
25-Jan	0.4	240	105 Email thread (13) re: LEO in 2019 and HCR 20 effective date
25-Jan	0.1	330	108 Rec and review Subpoena for Deposition sent to B. Baumgart
25-Jan	0.2	330	108 Emails with K. O'Connor and M. Abrams re: change of depo date and documents
26-Jan	0.1	310	105 Call with Marnie F. re: processing the Subp.
26-Jan	2.5	330	101 Review discovery docs/Prozanski Depos/RFA/Rogs for Depo. Outline questions
26-Jan	0.1	330	109 Video link email for Prozanski #3 depo
26-Jan	0.1	330	107 Emails with K. O'Connor and M. Abrams re: new depo date and documents/send new subp
27-Jan	0.2	330	101 Email Depo Exhibits 1-10 to Abrams for Prozanski - finalize attachments
27-Jan	1.5	330	101 Pre-depo prep - Exhibits - Questions/meeting with client
27-Jan	2.5	330	109 Deposition of F. Prozanski #3 - by video
27-Jan	0.3	330	106 Post depo call with client
27-Jan	0.1	310	108 Finalize Baumgart Subpoena and send
27-Jan	0.2	330	106 Email from client with depo notes attached - Prozanski #3
27-Jan	0.5	440	105 Trial Management Order rec and reviewed/dates calendared
28-Jan	0.1	330	106 Email from client with impeachment evid. Related to Prozanski
28-Jan	0.2	240	106 Email with 7/8/19 work session transcript attached - respond
28-Jan	0.3	240	105 Email thread (10) re: Prozanski v. Knieling authority under HCR 20
30-Jan	0.3	410	102 Prepare for call with fact witness
30-Jan	0.6	410	108 Call with Fact witness for Declaration
30-Jan	0.75	410	103 Draft Declaration for Fact witness interviewed
31-Jan	0.2	410	102 Prep for call with fact witness
31-Jan	0.3	410	108 Call with Fact witness for Declaration
31-Jan	0.6	410	103 Draft Declaration for Fact witness interviewed
31-Jan	0.3	240	104 Read through MSJ draft and information/evidence
31-Jan	0.4	240	105 Call with B. Jones re: MSJ edits and declarations
31-Jan	0.2	240	103 Add edits suggested by B. Jones
1-Feb	0.2	240	105 Emails with additional to Decl and MSJ
1-Feb	0.5	240	103 First draft of fact witness declaration
2-Feb	0.2	240	108 Emails to fact witness with declar. Draft - requesting corrections/edit - response
2-Feb	0.3	240	103 Continue drafting fact witness declaration
2-Feb	0.3	240	105 Email discussion re: 7/8/19 cmte evidence/statements
2-Feb	0.6	240	108 Call with fact witness to go over draft declarations/corrections/
2-Feb	0.4	240	105 Email with MSJ draft/review fact section/edit
2-Feb	0.2	240	103 Finalize fact witness #4 declaration - send
2-Feb	0.1	240	108 Call fact witness #3 and discuss decl
2-Feb	0.1	240	103 Add edits suggested by fact witness #3
2-Feb	0.2	240	105 Call with B. Jones re: declarations and SMJ
3-Feb	0.5	240	103 Review decl. list and evidence for MSJ
3-Feb	0.1	240	105 Case related to mootness - discussion with B. Jones
3-Feb	0.2	330	105 Email thread (6) with court reporter and team re: logistics for 2/15 Baumgart depo
3-Feb	0.1	240	108 Emails with fact witness to schedule call
5-Feb	0.3	240	103 Review draft declaration for fact witness #1 - make additions
5-Feb	0.75	240	108 Call with fact witness #1 - discuss facts/make additions/edits
5-Feb	0.5	240	103 Review videos related to fact witness #1 - send video to witness

6-Feb	0.2	240	106 Review of Ex Officio status and 7/8/19 hearing - email thread (6)
7-Feb	0.2	240	106 Emails with fact asserted by witnesses for MSJ
7-Feb	0.1	240	108 Call pot. Fact witness #5
7-Feb	0.1	320	107 Email to K. O'Connor and M. Abrams re: compliance with Subpoena Duces Tecum
7-Feb	0.3	240	105 Call with B. Jones with additional evid for MSJ
7-Feb	0.2	240	108 Rec and review email and attachment from Witness #1w/ edit edits to declaration - respond
8-Feb	0.1	330	106 Call with client re: 2/15 depo
8-Feb	0.1	240	108 Email fact witness #2 initial draft of decl based on prior interview
8-Feb	1.1	240	108 Call with fact witness #2 - walk through declaration/add facts/edits
9-Feb	0.1	240	106 Call with client - status and plan update
10-Feb	0.3	330	108 Email from court reporter with Prozanski depo #3 trans attached - download/review/file
11-Feb	0.1	240	105 Email from B. Jones re: use of declarations in MSJ
12-Feb	0.2	240	108 Emails with fact witness #2 re: final version/edits?
13-Feb	0.2	320	108 Email from Karen O'Connor with Batch #1 - Download/file - Respond
13-Feb	3	320	104 Read/review batch #1 (104 pp) of documents - print relevant docs
13-Feb	0.2	240	105 Review Intro section of draft Intro section for MSJ - email B. Jones with additions
13-Feb	0.2	240	108 Email and attachment with signed declaration from fact witness #1 - respond
13-Feb	0.1	240	108 Emails with fact witness #2 re: final version signed and returned - respond
13-Feb	0.1	240	105 Email signed Declaration to B. Jones
13-Feb	0.3	320	108 Email to Karen O'Connor re; Batch #2 & #3
14-Feb	0.2	320	108 Email from Karen O'Connor with Batch #2
14-Feb	4.5	320	103 Read/review batch #2 (209 pp) of documents - print relevant docs
14-Feb	1.5	320	103 Read/review batch #3 (43 pp) of documents - print relevant docs
14-Feb	0.2	240	108 Emails with fact witness #3 re: final version/edits?
15-Feb	0.2	240	105 Call with Beth to discuss document batches and relevant evidence
15-Feb	3.1	330	109 Drive from Powell Butte to Portland for Depo/listen to audio of 7/8/19 hearing
15-Feb	2	330	109 Deposition of B. Baumgart #2 - Portland
15-Feb	0.4	330	106 Call with client to give status and nexts steps
15-Feb	0.1	240	108 Call witness #3 re: status of declaration
15-Feb	1	330	111 Drive from Portland to Salem
16-Feb	0.5	240	105 Mtg with B. Jones - outline final step and need to beef up fact section
16-Feb	0.3	240	108 Email from Witness #3 with several additional paragraphs to decl. - edits done/returned to witness
16-Feb	6.5	240	103 Work on MSJ fact section/read depos/exh/documents
16-Feb	0.2	240	108 Emails with fact witness #3 re: final version signed and returned - respond
17-Feb	7	240	103 Work on MSJ - declarations/read depos/exh/documents
17-Feb	2.5	330	111 Drive from Salem to Powell Butte
20-Feb	0.2	240	105 Call with B. Jones re: Exh. + additional pp for MSJ
20-Feb	2	240	103 made edits/thin down fact section - tighten up
20-Feb	0.3	330	108 Email from court reporter with Baumgart depo #2 trans attached - download/review/file
21-Feb	3.5	240	104 Work on Exhibits for MSJ and fact section
21-Feb	0.2	240	105 Emails re: Exh 26 and deposition support/B. Jones response
22-Feb	1	240	104 Read through current draft of MSJ
24-Feb	2	240	104 MSJ review and edit
24-Feb	0.2	240	106 Email update to client on MSJ/provide updated cost bill related to expenses
26-Feb	0.2	240	106 Email thread (4) with updated version of MSJ - req for accuracy check/read through
26-Feb	0.1	240	106 Email from client post MSJ read - approved
27-Feb	0.75	240	104 Review final version of MSJ - approve
27-Feb	0.2	240	105 Call with B. Jones re: MSJ filing
27-Feb	0.5	240	104 Read through Def. Motion for Summary Judgment
27-Feb	0.2	240	105 Call with B. Jones to discuss Def. filing

27-Feb	0.1	230	108 Review email response from US District Court regarding document filed (51) - PI MSJ
27-Feb	0.1	230	108 Review email response from US District Court regarding document filed (52) - Def MSJ
27-Feb	0.1	230	108 Review email response from US District Court regarding document filed (53) - Jones + Attachments
27-Feb	0.1	230	108 Review email response from US District Court regarding document filed (54) - P. Boquist decl
27-Feb	0.1	230	108 Review email response from US District Court regarding document filed (55) - Johnson decl
27-Feb	0.1	230	108 Review email response from US District Court regarding document filed (56) - Knopp decl
27-Feb	0.1	230	108 Review email response from US District Court regarding document filed (57) - Olsen Decl
27-Feb	0.1	230	108 Review email response from US District Court regarding document filed (58) - Abrams Decl
27-Feb	0.2	230	107 Email to Abrams & White offering digital USB of Plaintiff's Exh to MSJ - Abrams would like sent to PDX office
27-Feb	0.1	240	106 Email by B. Jones to client with copy of filings- respond
28-Feb	0.1	240	107 Email from M. Abrams re: filing corrected MSJ due to lack of content and table of cases
28-Feb	0.1	240	107 Response to M. Abrams with agreement to extend deadline to respond
28-Feb	0.1	230	108 Review email response from US District Court regarding document filed (60) - Prozanski Decl
28-Feb	0.3	240	106 Email thread (7) with initial analysis of Def. MSJ - begin to note pot. Arguments
28-Feb	0.3	240	104 Read Corrected version of Def. MSJ
1-Mar	0.3	240	106 Email thread (10) with client and B. Jones re: Response extention/plan/analysis
2-Mar	0.1	230	108 Review email response from US District Court regarding document filed (61) - MOET
3-Mar	0.3	240	105 Call with B. Jones to discuss Def. filing and strategy for Response
3-Mar	0.1	230	108 Review email response from US District Court regarding document filed (62) - MOET Order
8-Mar	0.3	240	105 Email thread (5) discussion on Veteran Status argument/respond/edits
10-Mar	0.5	240	103 Work on outline for fact/evid in PI Response
11-Mar	0.2	240	105 Status discussion by email on PI Response to Def. MSJ/review and respond
11-Mar	0.1	240	105 Email from B.Jones with updated draft attached - respond
11-Mar	0.3	240	104 Read and edit B. Jones' draft
12-Mar	0.5	240	104 Review clients notes on Def. MSJ/consider edits in response
12-Mar	0.75	240	103 Review and capture depo ref/quotes in Def. MSJ - begin process of fact checking
12-Mar	1	240	104 Read depositions to fact check
17-Mar	0.5	240	103 Cont. working on rebutting factual assertions in Def. MSJ with evidence
18-Mar	1.5	240	103 Read depositions to fact check/draft rebuttal points
18-Mar	0.1	240	105 Rec and review email with updated version of PI Response
19-Mar	0.75	240	104 Read updated version
19-Mar	0.75	240	103 continue to draft factual sections
19-Mar	2.5	240	104 Read and cite Depo evidence in factual section
20-Mar	0.2	240	104 Review fact section draft & argument section draft
20-Mar	0.4	240	105 Call with B. Jones - how to trim down Response
21-Mar	0.1	240	103 call with pot fact witness to rebut Def. assertions
21-Mar	0.4	240	103 Draft of declaration for fact witness
21-Mar	0.3	240	104 Review Prozanski #1, 2, and 3 for Courtney related info
21-Mar	0.3	240	104 Review Courtney depo and exh.
22-Mar	1.2	240	104 cont with review of courtney depo/select quotes and exh.
22-Mar	0.2	240	106 Email to client requesting reminder of evidence to rebut Def. arg. - client response
22-Mar	1.5	240	104 Review Perp. Testimony of Courtney - select pot. Quotes
23-Mar	0.2	240	106 Client emails with Sen. Rules in 2019 /links/attachments
23-Mar	0.1	240	106 Email from client with Sen. Journal and LC opinion/attachments
23-Mar	0.3	240	105 Email thread (5) discussion on Auth to act versus capacity
23-Mar	0.1	240	106 Email to client with draft - request review/edits
25-Mar	0.2	240	108 Call with B. Johnson re: ex officio/Courtney/2019
25-Mar	0.2	240	106 Email with evidentiary attachment re: ex officio action by courtney in 2019
25-Mar	0.2	240	108 Email thread with pot witness - decided not to use evid.
25-Mar	0.2	240	108 Emails re: Johnson being removed from committee by Courtney ex officio/attachments

25-Mar	1.3	240	103 Draft Second Declaration of B. Johnson
25-Mar	0.3	240	105 Email thread (8) outlining clear evid or Courtney using ex officio auth in 2019 before 7/8/19
25-Mar	0.2	240	108 Email to B. Johnson with draft 2nd decl + Exh./Knopp decl/Olsen decl - req. edits
25-Mar	0.1	240	106 Evidence of state funds being spent for 7/8/19 hearing
26-Mar	0.1	240	108 Email to B. Johnson with final draft 2nd decl - request edits/sign/return
26-Mar	0.5	240	104 Rec and read through response for edits - respond and send edits to B. Jones
27-Mar	0.5	240	104 Rec and read through final version of Response - approved for filing
27-Mar	0.2	240	108 Rec and review sign sec. declaration from B. Johnson - email to office for processing
27-Mar	0.1	230	108 Review email response from US District Court regarding document filed (64) - Def Response
27-Mar	0.1	230	108 Review email response from US District Court regarding document filed (65) - PL Response
27-Mar	0.1	230	108 Review email response from US District Court regarding document filed (66) - Jones decl
27-Mar	0.1	230	108 Review email response from US District Court regarding document filed (67) - B. Johnson
28-Mar	0.1	240	106 Emails with client re: filings
28-Mar	0.3	240	105 Email thread (10) re: analysis of Def. Response and pot. Arguments
31-Mar	0.2	240	105 Email thread (5) re: Reply and date to be filed
5-Apr	0.3	240	105 Email thread (7) with initial analysis of Def. Repsonse - discuss evidence /pot. Arguments
6-Apr	0.3	240	105 Email with First full draft of Reply - begin review
7-Apr	0.75	240	103 Review and edit reply
7-Apr	0.5	240	105 Call with B. Jones to go over edits and pot arguments
7-Apr	0.1	240	105 Email with B. Boquist Decl attached/review
7-Apr	0.4	240	105 Updated reply rec. Read through for edits
9-Apr	0.2	240	105 Emails regarding adding footnote
10-Apr	0.3	240	104 Email with final Reply/Reviewed for approval/response
10-Apr	0.1	230	108 Review email response from US District Court regarding document filed (68) - Def Reply
10-Apr	0.1	240	105 Email with Def. Reply
10-Apr	0.1	230	108 Review email response from US District Court regarding document filed (69) - Abrams 2nd Decl
10-Apr	0.1	230	108 Review email response from US District Court regarding document filed (70) - PI Reply
10-Apr	0.1	230	108 Review email response from US District Court regarding document filed (71) - Supple Jones decl
10-Apr	0.1	230	108 Review email response from US District Court regarding document filed (72) - B. Boquist decl
11-Apr	0.2	240	108 Email with PI MSJ + Decl to fact witness with status update
11-Apr	2	240	106 Email thread (4) re: Def. Reply and issue regarding citing wrong HCR
12-Apr	0.4	240	105 Call with B. Jones re: Abrams "Exhibit O" and need to address
13-Apr	0.2	240	105 Email of draft email to M. Abrams re: Exh O - respond
14-Apr	0.2	240	107 Email to M. Abrams & T. White re: Exh. O
17-Apr	0.5	240	107 Email thread (10) with M. Abrams & B. Jones re: Exh O and Sur Reply
17-Apr	0.3	240	105 email discussion on Sur Reply and LR 56-1
17-Apr	0.2	240	103 Rec and Review draft Sur Reply/edit/approve
17-Apr	0.1	230	108 Review email response from US District Court regarding document filed (73) -Sur Reply
17-Apr	0.1	230	108 Review email response from US District Court regarding document filed (74) - Jones decl
18-Apr	0.2	240	106 Email update to client with copy of Sur Reply
19-Apr	0.2	240	108 email from M. Abrams re: objection to PI use of term "employee"
19-Apr	0.2	240	105 Call with B. Jones - discuss Abrams' objection and response
19-Apr	0.1	240	108 Response by B. Jones to M. Abrams
19-Apr	0.2	240	105 email thread (5) discussing evidence and Baumgart/employee
19-Apr	0.2	240	108 email from M. Abrams in response to B. Jones - PI. not an employee
19-Apr	0.1	240	108 email response to Abrams by B. Jones - an evidentiary obj - not about employee status
19-Apr	0.4	240	108 Rec and review email thread between Abrams and Jones on Sur-Reply issue
7-May	0.1	310	106 Questions about documents - respond
12-May	0.1	230	108 Review email response from US District Court regarding document filed (75) - change of address
7-Jun	0.1	230	108 Review email response from US District Court regarding document filed (76) - Sched Order - Oral arg set for 7/11/23

7-Jun	0.3	240	105 Email thread (8) discussion oral argument date and preparation
7-Jun	0.4	240	108 Email thread (10) with court staff and parties re: finding date and time which works for all
7-Jun	0.1	240	108 Review email response from US District Court regarding document filed (77) - Order changing date to 7/10/23
7-Jun	0.4	240	105 call with B. Jones re: Oral argument plan/who takes what/Trial order sched still apply?
7-Jun	0.3	440	108 Emails with court (4) re: current trial order still in effect? Different dates due to oral arguments
8-Jun	0.3	430	105 call with B. Jones regarding Trial Order due 7/11/23 and need to draft
8-Jun	0.3	240	105 Email thread (7) re: date change/logistics/necessary arguments
8-Jun	0.1	120	106 Email from client re: req. phone conf/plan
9-Jun	0.1	440	107 Email from M. Abrams re: Witnesses for trial/planning/length of case
9-Jun	0.1	230	108 Review email response from US District Court regarding document filed (78) - sched order- trial mgt
9-Jun	0.1	440	105 Email to team and client re: New sched order/remove tickles from calendar
14-Jun	0.1	440	107 Rec and reviewed email from M. Abrams re: Manning unavail for trial/ perpetuation requested
14-Jun	0.2	440	105 Call with B. Jones re: trial prep/witnesses/Manning issue
15-Jun	0.3	440	107 Email thread (8) re: Manning unavail for trial/ perpetuation requested
16-Jun	0.1	440	107 Rec and review email from M. Abrams re: Manning issue
21-Jun	0.3	440	105 Call with B. Jones re: Abrams requests for trial outline of time and witnesses
28-Jun	0.2	240	107 rec and review email from T. White to Court clerk with Counterman case attached
28-Jun	0.4	240	102 Read through Counterman case
28-Jun	0.2	240	105 Email thread (4) re: Counterman analysis/not relevant to this matter/tangential
6-Jul	0.3	440	105 Email thread (7) w/ team and client re: logistics/final prep over weekend
6-Jul	4.5	440	104 Review Pl. MSJ/Def. Reponse/Pl. Reply & all exhibits - outline main points
7-Jul	3.2	440	104 Review Def. MSJ/Pl. Response/Def. Reply/Pl. Sur Reply & all exhibits - outline main points
7-Jul	0.2	440	106 Email thread (4) w/ client on arguments & logistics
9-Jul	2.5	450	109 Drive from Powell Butte to Salem - final prep for 7/10/23 oral arg.
9-Jul	1.5	430	104 Re-read critical elements 9th Circ. Opinion in Boquist case
10-Jul	2	430	101 Finish Exhibit notebook for Oral arguments
10-Jul	2.5	430	104 Final overview of Def. briefs and factual errors/HCR 20 & no Auth/Courtney culpabiity/Notices w/no names
10-Jul	0.5	430	105 Meeting with B. Jones - final issues discussed
10-Jul	1	450	109 drive to Fed Courthouse in Eugene
10-Jul	0.75	450	106 Pre-argument meeting at court with client/team
10-Jul	1.5	450	109 Oral arguments on cross motions
10-Jul	0.5	120	106 Post argument meeting with client/team
10-Jul	1	450	111 Drive from Eugene to Salem
10-Jul	0.1	230	108 Review email response from US District Court regarding document filed (79) - Minutes of Proceeding
11-Jul	0.5	460	105 Meeting with B. Jones re: nec pleadings for fees & costs/tentative plan
11-Jul	0.3	460	106 call with client re: costs and next steps
11-Jul	2.5	450	111 Drive from Salem to Powell Butte
11-Jul	0.3	460	105 Email from B. Jones w/ time sheet and OSB 2022 Economic Survery attached - reviewed
11-Jul	0.4	460	105 Email with attachment - Order of Motion for fees/cost example - read and respond
12-Jul	0.3	460	105 Email thread (7) re: cost and invoices for exhibits
14-Jul	0.2	460	108 Conf. call regarding post judgment plan
14-Jul	0.3	460	105 Call with B. Jones re: dividing up necessary pleading/reduce duplication/VDD fees & main docs/BAJ Bill of Cost
17-Jul	0.1	230	108 Review email response from US District Court regarding document filed (80) - Opinion & Order
17-Jul	0.1	230	108 Review email response from US District Court regarding document filed (81) - Judgment
17-Jul	0.5	460	104 Read through Opinion & Order - make notes on key points
17-Jul	0.1	460	104 Read Judgment
17-Jul	0.4	460	106 Conf. call with client and team. Discuss plan and exhibits for motion/memo/decl
18-Jul	0.5	460	102 Research FRCP and cases on fees/costs
18-Jul	1.5	460	103 Outline motion and memo
18-Jul	0.6	460	105 Email thread (24) regarding Opinion & Order/next steps/plan



18-Jul	0.3	460	102 Email to Jeff Gallant (JMCFS) regarding ECF 80 & 81. Schedule call to discuss
19-Jul	0.2	460	108 Email to B. Creighton re: expert opinion Declaration. Out through 8/12
21-Jul	0.2	460	105 Call with B. Jones re: elements of declarations
22-Jul	0.6	460	103 Begin draft of V. Day Declaration
22-Jul	0.5	460	103 Begin draft of B. Jones Declaration
22-Jul	1.2	460	102 Research fees/OSB 2022 Economic Survey
22-Jul	0.5	460	108 Discussion with M. McLane re: expert opinion Declaration. Agreed to review.
22-Jul	0.1	460	105 Call with B. Jones re: fees and costs exhibits
23-Jul	0.5	460	103 Finish Motion
23-Jul	1.5	460	103 Draft Memorandum outline
24-Jul	1.8	460	103 Move time from Word to Excel sheet for Exh. Review and correc codes
24-Jul	0.75	460	103 Continue drafting Memo
24-Jul	0.4	460	103 Add paragraph to Motion
24-Jul	0.2	460	108 Call with McLane re: necessary document and timing
24-Jul	1.3	460	103 Cont. drafting V. Day Declaration
24-Jul	1.75	460	103 Cont. drafting memo
24-Jul	1.5	460	103 Research Depo times/Exh and draft discovery section of memo
25-Jul	0.5	460	105 Call with B. Jones re: need to have all elements completed by 7/29 so filing prep can be done
26-Jul	0.2	460	102 Research cases and add citations to memo/continue drafting declaration and memo
26-Jul	0.3	460	105 Call with B. Jones re: 10 page limit on memo/cut certain facts out/argument good
28-Jul	0.5	460	104 Review B. Jones time sheet & exh. Add data into memo - email to McLane
28-Jul	0.3	460	104 Review Bill of Cost pleading & exh. Add information into Decl & Memo
28-Jul	0.3	460	104 Call with B. Jones re: status/discussion on Bill of costs/memo/declarations
28-Jul	0.75	460	104 Review time sheet and add narrative where necessary
29-Jul	0.3	460	103 Finalize Motion & send to B. Jones for formatting/filing
29-Jul	1.2	460	103 Finalize Memorandum/citations/Exhibits/send to B. Jones for formatting/filing
29-Jul	0.5	460	103 Finalize Excel Time sheet - cull out small task/short emails
29-Jul	0.1	460	108 Email final Excel time sheet (V. Day) to M. McLane & B. Jones
29-Jul	0.2	460	103 Finalize V. Day Declaration and send to McLane & B. Jones
<b>TOTAL HOUR 557.23</b>			
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